

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO. 16-34006-H5-13
	§	
CHRISTOPHER LANCE ROBERTS and JORDAN GABRIELLE GREENE, DEBTORS	§ § § §	CHAPTER 13

**Chapter 13 Trustee's Response to Debtors' Motion
to Sell Non-Exempt Real Estate
(Docket #75)**

William E. Heitkamp, Trustee, responds to Debtors' Motion to Sell Non-Exempt Real Estate (docket #75) as follows:

1. Debtors request approval to sell the property (the "Property") described as 5734 Meadow Creek Lane, Houston, Texas 77017. The Property is listed in Debtors' Schedule A/B (docket #17) filed in this case.

2. Debtors are seeking to sell the Property to Ernesto Diaz and Lissette Diaz for the purchase price of \$108,000.00. Provided that the sales price reflects an arms-length transaction at market value, Trustee does not oppose the sale under those terms.

3. Trustee requests a copy of the settlement statement. While Debtors propose that their portion of the proceeds be paid over to Trustee, Trustee requests that the order clarify that 100% of the net proceeds be turned over, at closing, directly to Trustee for immediate distribution to allowed general unsecured claims in addition to any amounts called for in the confirmed plan.

For these reasons, Trustee prays that the Court enter an order (i) directing that Trustee be provided with a copy of the settlement statement and that (ii) 100% of the net proceeds from any sale that may be authorized be forwarded, at the time of closing, to Trustee for distribution in

accordance with this response and (iii) for such other and further relief to which he may be entitled.

RESPECTFULLY SUBMITTED,

/s/William E. Heitkamp

William E. Heitkamp, Trustee

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was sent to all parties as listed below via electronic means as listed on the Court's ECF Noticing System or by prepaid first class U.S. Mail on May 8th, 2020.

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/s/William E. Heitkamp

William E. Heitkamp, Trustee